

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ALONZO ACEY,)	
)	
Plaintiff,)	
)	
vs)	No. 16 CV 2843
)	
CITY OF CHICAGO, et al,)	
)	
Defendants.)	

The discovery deposition of THEODORE THOMAS, taken in the above-entitled cause before Steven J. Brickey, CSR, State of Illinois, at 30 North LaSalle Street, Chicago, Illinois, on the 25th day of April, A.D., 2018, commencing at 2:00 o'clock p.m.

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1 true and accurate depiction of the Special Weapons
2 and Tactics Team Supplementary Report.

3 Q. Did you ever show Mr. Acey a copy of
4 this SWAT Supplementary Report?

5 A. If I received this document, yes, I
6 showed it to him.

7 Q. Do you remember when you would have
8 showed it to him?

9 A. At some point during our
10 conversations.

11 Q. Do you know if it would have been
12 within 2015?

13 A. I do not know.

14 Q. Do you know if it would have been
15 within 2016?

16 A. It would have been sometime during
17 our representation, but I cannot tell you the
18 year.

19 Q. Did you ever provide Mr. Acey with a
20 copy of this SWAT Supplementary Report?

21 A. No.

22 Q. Is there any way for a criminal
23 defendant, to the best of your knowledge, to
24 request a copy of the SWAT Supplementary Report

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1 previously Bates stamped FCRL 0118 to FCRL 0125.

2 Is Exhibit 5 a copy of the
3 search warrant in relation to Mr. Acey's case?

4 A. Yes.

5 Q. And did Mr. Acey ever ask you for a
6 copy of the search warrant?

7 A. I don't recall.

8 Q. Did you ever show Mr. Acey any
9 copies of this search warrant?

10 A. Yes, I did show him the search
11 warrant.

12 Q. And when did you show that to him?

13 A. I don't know when.

14 Q. Do you know if it was in 2015?

15 A. I do not know.

16 Q. Did you ever provide Mr. Acey a copy
17 of this search warrant?

18 A. No, he wasn't provided a copy.

19 Q. Is there any way for any criminal
20 defendants to get copies of any search warrants
21 from someone other than their attorney?

22 A. Yes, he can make a FOIA request.

23 Q. Thank you. You can put that aside.

24 MR. KRAKAUER: By the way, when you

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1 when I was first appointed to his case.

2 Q. Is Exhibit 6 a copy of that Original
3 Case Incident Report?

4 A. It is.

5 Q. And did you ever show Mr. Acey this
6 Original Case Incident Report?

7 A. Yes.

8 Q. Do you know when?

9 A. No.

10 Q. Do you know if that was in 2015?

11 A. I do not know the date or the year.

12 Q. Did Mr. Acey ever ask you for a copy
13 of --

14 MR. KRAKAUER: Objection.

15 MS. DIMOND: Objection.

16 MS. DORY: I'll move on.

17 BY MS. DORY:

18 Q. Did you ever provide Mr. Acey a copy
19 of this Original Case Incident Report?

20 A. I showed it to him, but he did not
21 get to keep it.

22 Q. Why not?

23 MS. DIMOND: This is under Supreme
24 Court Rule 415.

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1 STATE OF ILLINOIS)
2) SS.
3 COUNTY OF COOK)

4 I, Steven Brickey, Certified Shorthand
5 Reporter, do hereby certify that on the 25th day
6 of April, A.D., 2018, the deposition of the
7 witness, THEODORE THOMAS, called by the
8 Defendants, was taken before me, reported
9 stenographically, and was thereafter reduced to
10 typewriting under my direction.

11 The said deposition was taken at 30 North
12 LaSalle Street, Chicago, Illinois, and there were
13 present counsel as previously set forth.

14 The said witness, THEODORE THOMAS, was first
15 duly sworn to tell the truth, the whole truth, and
16 nothing but the truth, and was then examined upon
17 oral interrogatories.

18 I further certify that the foregoing is a
19 true, accurate, and complete record of the
20 questions asked of and answers made by the said
21 witness, THEODORE THOMAS, at the time and place
22 hereinabove referred to.

23 The signature of the witness, THEODORE
24 THOMAS, was waived by agreement of counsel.

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1 The undersigned is not interested in the
2 within case, nor of kin or counsel to any of the
3 parties.

4 Witness my official signature in and for
5 Cook County, Illinois, on this _____ day of
6 _____, A.D., 2018.

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16 Phone: (312) 419-9292
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